" : " 1995-03-23-0A-FEA - Royal garden Hotel Proposed floor and expansion goning various

REVISED

FINAL ENVIRONMENTAL ASSESSMENT THE ROYAL GARDEN HOTEL PROPOSED FLOOR AREA EXPANSION

440 Olohana Street, Waikiki, Oahu, Hawaii TMK: 2-6-16: 39, 53, 56, 57, 58, 59 and 60

295 JUN 21 PM 3 32 GEFT OF LAND UTILIZATION OF A GOUNTY OF HOMOLUS

Nichiei USA, Inc. c/o Royal Garden Hotel 440 Olohana Street Honolulu, Hawaii 96815

APPLICANT

Kusao & Kurahashi, Inc.
Planning and Zoning Consultants
Ward Plaza
210 Ward Avenue, Suite 124
Honolulu, Hawaii 96814

AGENT

JUNE 1995

REVISED

FINAL ENVIRONMENTAL ASSESSMENT THE ROYAL GARDEN HOTEL PROPOSED FLOOR AREA EXPANSION

440 Olohana Street, Waikiki, Oahu, Hawaii TMK: 2-6-16: 39, 53, 56, 57, 58, 59 and 60

Nichiei USA, Inc. c/o Royal Garden Hotel 440 Olohana Street Honolulu, Hawaii 96815

APPLICANT

Kusao & Kurahashi, Inc.
Planning and Zoning Consultants
Ward Plaza
210 Ward Avenue, Suite 124
Honolulu, Hawaii 96814

AGENT

JUNE 1995

TABLE OF CONTENTS

		Page
I.	INTRODUCTION	
	Annlicant	. 1
	1. Applicant	. 4
	 Applicant Recorded Fee Owner Approving Agency 	4
	3. Approving Agency	5
	3. Approving Agency 4. Tax Map Keys	5
	4. Tax Map Keys	5
	5. Agent	5
	6. Location	5
	7. Lot Area	5
	8. Zoning 9. State Land Use	5
	10. Development Plan	· 5
	11. Special District	5
	12. Existing Use	5
		6
П.	PROPERTY DESCRIPTION	_
	A. Location	6
	B. Topography	6
		6
Ш.	TECHNICAL CHARACTERISTICS	_
	variance Application	6
		7
		11
IV.	BACKGROUND	14
w 7	·	14
V.	SOCIO-ECONOMIC CHARACTERISTICS	17
	A. Existing Use and Surrounding Uses	17 17
		19
. 7 .		1.7
VI.	ENVIRONMENTAL CHARACTERISTICS	19
		. 🥕

VII.	AFFECTED ENVIRONMENT	20
VIII.	AGENCY COMMENTS ON DRAFT ENVIRONMENTAL ASSESSMENT	21
IX.	MAJOR IMPACTS AND ALTERNATIVES CONSIDERED	23
x.	MITIGATION MEASURES	24
YI.	RECOMMENDATION	24

and the second of the second o

LIST OF EXHIBITS

<u>Exhibit</u>	<u>Description</u>	<u>Page</u>
Α	Location Map	. 2
R	Zoning Map	. 3

LIST OF APPENDICES

Appendix	Description
I	Site Plans
n	Department of Land & Natural Resources Letter (dated February 14, 1995)

REVISED

FINAL ENVIRONMENTAL ASSESSMENT PROPOSED FLOOR AREA EXPANSION ROYAL GARDEN HOTEL

440 Olohana Street, Waikiki, Oahu, Hawaii TMK: 2-6-16: 39, 53, 56, 57, 58, 59 and 60.

I. INTRODUCTION

The applicant, Nichiei USA, Inc., proposes to develop needed expansion of accessory dining areas and kitchen, lounge, toilet, hallway, laundry collection and storage areas within the fourth floor and roof top floor of the existing Royal Garden Hotel located on Olohana Street and on the ground floor of an adjacent lot located on Namahana Street in Waikiki, Island of Oahu as shown on Exhibit A, Location Map and Exhibit B, Zoning Map. The site is zoned Apartment Precinct within the Waikiki Special District (WSD) and when consolidated or joint developed, would have a total lot area of 40,900 square feet. The existing hotel is developed on a lot consisting of 28,750 square feet. The project involves an additional 7,803 square feet of floor area for accessory uses, added to the existing hotel development. Most of this additional floor area occurs within the existing hotel structure's footprint or building area, with just 596 square feet

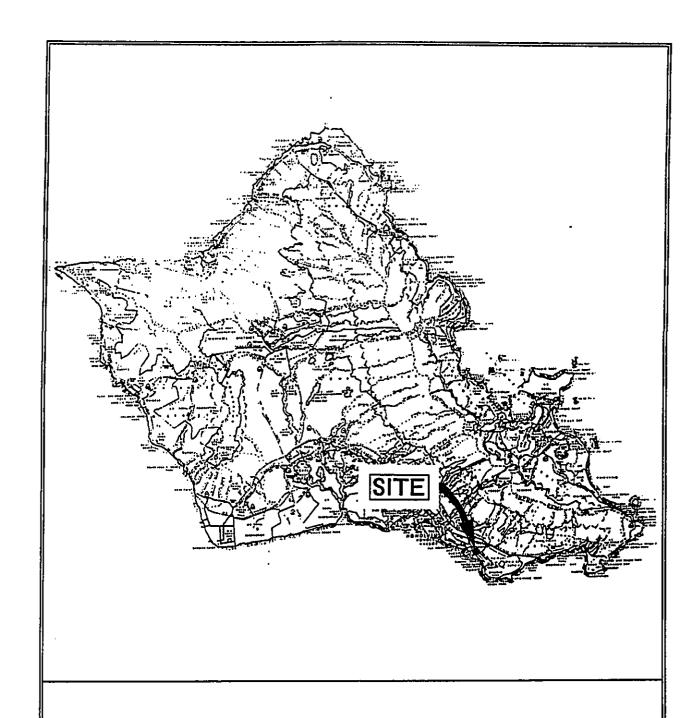
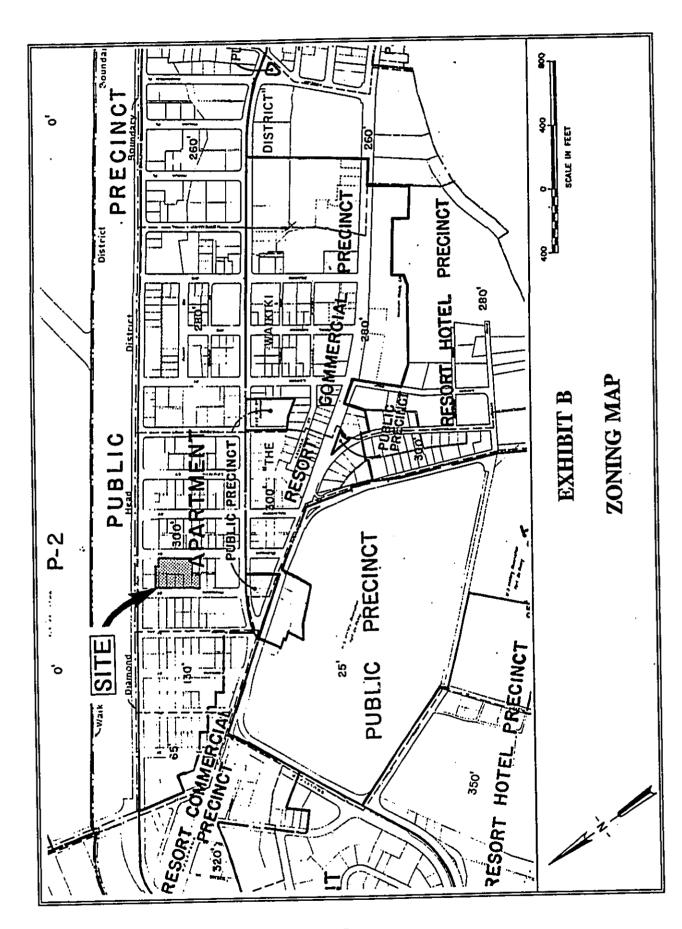


EXHIBIT A

LOCATION MAP



occurring outside of the existing hotel structure building area. A major portion of the additional floor area will be situated on the roof of the existing hotel which because of the height of the existing hotel would not be visible from the street level or from most of the surrounding structures, which are generally low-rise, two- to four-story structures.

In addition, the applicant proposes to change the use of an additional 1,580 square feet of floor area. Of this change, 188 square feet involves conversion of an existing hallway to Kitchen use while the remaining 1,392 square feet involves conversion of an existing Storage/Employee Lounge area to needed Banquet Room space.

Also being provided on the fourth floor is a new fire exit stairway down to the third floor. This fire exit is required for safety reasons and will not be enclosed. The access will not impede vehicular traffic on the third floor and a 13-foot, 8-inch vehicular aisle will be maintained.

A. GENERAL INFORMATION

1. Applicant

Nichiei USA, Inc. c/o Royal Garden Hotel 440 Olohana Street Honolulu, Hawaii 96815

Revised Final Environmental Assessment For Proposed Royal Garden Additions

2. Recorded Fee Owner : Nichiei USA, Inc.

c/o Royal Garden Hotel 440 Olohana Street

Honolulu, Hawaii 96815

3. Approving Agency : Department of Land Utilization

4. Tax Map Keys : 2-6-16: 39, 53, 56, 57, 58, 59

and 60

5. Agent : Kusao & Kurahashi, Inc.

Planning and Zoning Consultants

Ward Plaza

210 Ward Avenue, Suite 124 Honolulu, Hawaii 96814

6. Location : 440 Olohana Street - Waikiki

7. Lot Area : 40,900 square feet

8. Zoning : Apartment Precinct of the

Waikiki Special District

(Exhibit B)

9. State Land Use : Urban

10. Development Plan

Land Use Map : Medium Density Apartment

Public Facilities
Man

Map : No improvements affecting this

site

11. Special District : Waikiki Special District

12. Existing Use

Royal Garden Hotel

II. PROPERTY DESCRIPTION

A. Location

The subject property is located between Olohana Street and Namahana Street one lot makai of Ala Wai Boulevard in Waikiki.

B. Topography

The subject site is level and includes seven parcels. Located in an urban setting it contains the Royal Garden Hotel structure along its Olohana Street frontage and landscaping, and a swimming pool.

III. TECHNICAL CHARACTERISTICS

This environmental assessment was triggered by an application for variances from Section 3.120(c)(1) of the General Provisions of the Land Use Ordinance (LUO) and Sections 7.80-4(b)(2) and 7.80-4(c)(3) of the LUO pertaining to regulations within the Waikiki Special District.

A. Variance Application

The variance application requests variances from Section 3.120(c)(1), relating to the expansion of nonconforming uses, Section 7-80-4(b)(2), pertaining to regulations within the Waikiki Special District (WSD) of the Land Use Ordinance (LUO) relating to height setbacks, and Section 7.80-4(c)(3), relating to density and maximum floor area permitted.

The variance from Section 3.120(c)(1) seeks relief from a general LUO provision, which prohibits expansion of the floor area of the existing Royal Garden Hotel, a non-conforming use, to facilitate City approval to develop and enclose dining areas, kitchen, lounge, toilet, hallway, laundry collection and storage areas within the ground, fourth and roof top floors of the existing hotel.

The variance from Section 7.80-4(b)(2) seeks relief from a LUO provision, which requires additional height setbacks equal to one foot for each 10-feet in height, or fraction thereof, for structures over 40 feet in height. This provision prohibits expansion of the floor area of the existing Royal Garden Hotel's roof top area, which encroaches

into the height setback, to facilitate City approval to develop and enclose the proposed lounge, kitchen, restrooms and dining areas, an addition of 4,488 square feet, on the roof top of the existing hotel.

The variance from Section 7.80-4(c)(3) of the LUO, which establishes density (floor area) limits applicable to properties located within the WSD Apartment Precinct, is required because the expansion of the floor area increases the Hotel's total floor area which exceeds the maximum amount of floor area permissible within the subject property under the WSD.

To compensate for the modification in uses and additional density, the applicant proposes to consolidate or joint develop the existing hotel lot with two adjoining parcels and a 20-foot wide strip (portion of three additional parcels) with a lot area of 12,150 square feet to form one large lot with a total lot area of 40,900 square feet. The remaining lot area of the three parcels providing the 20-foot wide strip would be consolidated or joint developed to form one large lot

(11,600 square feet) which will eliminate three nonconforming lots (under 10,000 square feet in size). A total of five nonconforming lots will be eliminated by these actions.

Two of these additional adjoining full size parcels and the strip portion of three additional parcels would be devoted, except for a waterfall design element next to the swimming pool and a planned dining terrace (596 square feet), primarily to open space (including the swimming pool and deck area). Although there would be an increase in floor area of 7,803 square feet, the applicant would forego the development potential on several lots which would have permitted about 13,600 square feet of additional development.

The amount of nonconforming floor area would be reduced from 80,011 square feet to 75,664 square feet, while the floor area ratio (FAR) for the hotel development would be reduced from 3.8 to 2.8. This would reduce the nonconformity related to density and bring the floor area ratio closer to the 1.0 maximum (for other than dwelling use) prescribed by the Land Use Ordinance for the Apartment Precinct.

Since most of the additional floor area being proposed is within the limits of the footprint of existing Hotel structure on the site and results in a minimal amount of additional building footprint, there will be an increase in the percentage of open space on the proposed larger lot (61%) from the existing smaller hotel lot (49%). This would eliminate the nonconformity of the existing hotel lot related to the Land Use Ordinance's requirement for 50% open space in the Apartment Precinct.

We feel that this tradeoff would result in a reasonable use on the lot, permitting a modest increase in a nonconforming use while gaining a reduction in the nonconforming density on the restructured lot, elimination of five nonconforming (substandard) lots, and eliminating the nonconformity related to open space. The lot, as reconfigured would provide a substantial amount of open space which would provide a permanent amenity for the surrounding residents and would also eliminate the potential of an additional 13,600 square feet of floor area development.

B. Site Development

The proposed additions will include construction on the ground floor, (on an adjacent lot), fourth floor and roof of the existing Royal Garden Hotel.

The proposed development on the ground floor will involve development of a terrace area of 596 square feet (Appendix I, Sheet A-3) which will be added to the existing restaurant (Cascada) on the ground floor of the existing hotel. The proposed development on the fourth floor will consist of an addition of approximately 2,719 square feet. This addition would replace an existing lanai area and 12 parking stalls on the fourth floor. The fourth floor plan (Appendix I, Sheet A-5) shows the proposed dining area (952 square feet) and a 1,492 square foot addition which will include an expansion of the existing Banquet Room (540 square feet), a new hallway (311 square feet), a new restroom (72 square feet), a new laundry collection area (54 square feet), and a new storage area (515 square feet). In addition, three new freezers (275 square feet) will be situated in an open former parking area.

The roof top plan, Appendix I, Sheet A-7, shows the proposed lounge, kitchen, restrooms and dining areas, an addition of 4,488 square feet. The roof top additions would replace an existing open recreation area which includes four umbrella tables each with four chairs, a hopscotch layout and an American standard shuffleboard layout.

The proposed additions will increase the floor area for hotel accessory use by a total of 7,803 square feet. All of the new uses will be accessory to the existing Royal Garden Hotel.

The parking for the proposed development would be provided by the existing 60 parking stalls situated on the second and third floors of the existing hotel (Appendix I, Sheet A-2). An additional 18 parking stalls will be provided on a vacant lot, adjacent to the Hotel lot (Appendix I, Sheet A-3). The access to the off-site parking lot will be within 400 feet of a principal entrance to the Hotel. The applicant understands that this will require a Conditional Use Permit, Type 1 for off-site parking and this permit will be applied for should this variance request be approved.

The parking requirements of the Hotel and apartment are provided as follows:

Hotel Units: 59 spaces

(235 units at 1 space per 4 units = 59)

Accessory Uses: 17 spaces

Existing Uses -

Gift Shop	. 200 square feet
Ground Floor Restaurant	1.730 square feet
Ground Floor Lounge	1,000 square feet
Fourth Floor Restaurant	2 254 square feet

Proposed Uses -

Terrace Addition		596	square	feet
Fourth Floor Restaurant		952	square	feet
Fourth Floor Banquet(use change)	1	.392	square	feet
Fourth Floor Banquet		540	square	feet
Roof Top Restaurant	4	<u>.488</u>	square	<u>feet</u>
Total	13.	152 s	square	feet

(13,152 square feet at 1 space per 800 square feet = 17)

A total of 76 parking stalls are required for the site and the applicant plans to provide 78 parking stalls.

IV. BACKGROUND

The Hotel was built in the early 1970's under the provisions of the City's Comprehensive Zoning Code, predecessor to the current City Land Use Ordinance. The originally approved building plans for the Hotel establishes 260 studio hotel rooms within the Hotel. The applicant acquired the Royal Garden Hotel in January 1990 from Pleasant Hawaiian Holidays which owned the Hotel for approximately 12 years prior to the acquisition by the applicant.

On November 17, 1977, the Zoning Board of Appeals (ZBA) approved a variance (File No. 77/ZBA-120) to allow a 449-square foot addition, including a sundries shop and toilets, to a nonconforming hotel, which eliminated 2 off-street parking spaces on the fourth floor.

On November 27, 1977, the ZBA approved a variance (File No. 77-ZBA-128, to allow expansion of the hotel restaurant (a new mezzanine level); however, the ZBA denied the request for a snack bar near the swimming pool to encroach into required yards and a wall to exceed the height limit along 2 property lines.

On November 13, 1991 the Department of Land Utilization (DLU) approved a variance (File No. 91/VAR-7) which permitted the expansion of existing floor area on the fourth floor of the Hotel. A Conditional Use Permit for joint development of parcels 39 and 53 was approved on August 26, 1992 by DLU and was filed for recordation at the Bureau of Conveyance on February 24, 1992.

The previously approved floor plan under 91/VAR-7 has been modified with the total area in lounge/bar and restaurant use remaining about the same and a storage/employee lounge area on the fourth floor converted to needed banquet space.

The earlier variance approval called for a 2,960 square foot restaurant on the ground floor of the Hotel, adjacent to the hotel lobby. This proposed restaurant space has been developed with a 1,730 square foot restaurant and a 1,000 square foot restaurant/lounge. In addition, a planned 288 square foot gift shop has been relocated on the ground floor space and reduced in size to about 200 square feet. Also provided on the ground floor are men's and women's restrooms.

On the fourth floor the 2,035 square feet planned for a lounge/bar area has been developed as a restaurant/bar with accessory kitchen and restrooms utilizing 2,250 square feet of floor area. The total floor area originally planned for use as lounge/bar and restaurant has remained virtually the same.

The storage space on the fourth floor was converted to banquet space in order to accommodate groups staying at the Hotel that needed a modest sized banquet facility for their plenary meals and meetings. A hotel of this size without this accessory use will not remain competitive in today's tourism market.

The Hotel now contains 235 units in 24 stories, and is located on approximately 28,750 square feet of land situated on the northerly side of (and fronting) Olohana Street in Waikiki, Oahu, Hawaii. The Hotel is about 215 feet tall with an equipment, storage and elevator machine room extending an additional 21 feet for a total height of about 236 feet. This is below the 300-foot height limit of the Apartment Precinct at this location. The planned roof top restaurant will be developed well within this height limit. As discussed earlier, the project site including the existing hotel and

parcels planned for consolidation is located within the WSD Apartment Precinct along with the surrounding properties bounded by Ala Wai Boulevard and Kuhio Avenue.

The property is located within the Primary Urban Center Development Plan of the island of Oahu and described as Tax Map Keys: 2-6-16: 39, 56, 57, 58, 59 and 60. The property is located within an area dominated by a mixture of apartments and hotels and can be described as located within the fringe of Waikiki. Kuhio Avenue and Kalakaua Avenue are located within a close walking distance to the subject property.

V. SOCIO-ECONOMIC CHARACTERISTICS

A. Existing Use and Surrounding Uses

The site is in an urban setting surrounded by other hotel and apartment structures.

The use of the additional space for storage and dining will be accessory to the principal hotel use. They are intended mainly for the use of guests of the Hotel.

The current physical relationship between the Hotel and surrounding land uses remains unchanged with the requested variance.

As discussed earlier, most of the 7,803 square feet of additional floor area planned for the site occurs within the confines of the existing hotel structure's footprint or building area, with just 596 square feet occurring outside of the existing hotel structure building area. A major portion of the additional floor area will be situated on the roof of the existing hotel which because of the height of the existing hotel would not be visible from the street level or from most of the surrounding structures, which are generally low-rise, two- to four-story structures.

In addition, the applicant proposes to change the use of an additional 1,580 square feet of floor area. Of this change, 188 square feet involves conversion of an existing hallway to Kitchen use while the remaining 1,392 square feet involves conversion of an existing Storage/Employee Lounge area to needed Banquet Room space.

Also being provided on the fourth floor is a new fire exit stairway down to the third floor. This fire exit is required for safety

reasons and will not be enclosed. The access will not impede vehicular traffic on the third floor and a 13-foot, 8-inch vehicular aisle will be maintained.

Hotels and apartments structures are interspersed throughout the immediate surrounding area. Approval of the requested variance would give recognition to an existing hotel use of the subject property and thus would not result in any additional land use, traffic, environmental and other physical impacts within the surrounding neighborhood.

B. Employment

There will be a modest increase in the number of employees at the Hotel primarily in the food service functions.

VI. ENVIRONMENTAL CHARACTERISTICS

The modest floor area expansion of the existing 235-room Hotel will have negligible environmental impact on the building or the surrounding area. There would be a modest increase in the cubic content of the existing

structure since most improvements occur within the footprint of the existing hotel and apartment structures on the site. Therefore there will be minimal impact on the bulk, height or external appearance of the Hotel.

The additional 7,803 square feet of floor area proposed in the variance application is modest when considering the needs of a 235-room hotel in the context of today's hotel design standards.

VII. AFFECTED ENVIRONMENT

The affected environment is an urban area which is fully developed. There are no endangered flora, fauna or significant habitats in this urban area. Since the area is fully developed and limited additional site work will be done on the subject lot, the project will not impact on historical/archaeological and cultural sites.

The Ala Wai Canal is located approximately 175 feet mauka (north) of the subject lot. The Pacific Ocean (Waikiki Beach) is located approximately 2,500 feet makai (south) of the subject lot. The project will not have any effect on these two bodies of water.

VIII. AGENCY COMMENTS ON DRAFT ENVIRONMENTAL ASSESSMENT

The Department of Land Utilization has requested comments, during the Draft Environmental Assessment review, from various City, and State agencies who provide infrastructure or services which may be affected by the proposed development. To date the Department of Land & Natural Resources has responded with their response attached in Appendix II and restated below:

"A review of our records shows that portions of these parcels might have contained a major irrigation ditch ('auwai) prior to the Waikiki Reclamation Project, when this area was filled. Excavations at Fort DeRussy, makai of this project, have shown that features such as this were often buried intact. Thus, it is likely that the 'auwai and the fields that it irrigated still contain information important for Hawaiian history and prehistory which would make them eligible for listing on the Hawaii Register of Historic of Historic Places. Thus, in the event that a zoning variance for this nonconforming project is

granted we would appreciate the opportunity to review construction and excavation plans so that we can determine whether the project is likely to have an adverse effect on potentially significant historic sites and make suitable recommendations to the Department of Land Utilization."

Comment

The applicant will submit construction and excavation plans to the Department of Land & Natural Resources, State Historic Preservation Division for their review and recommendation prior to construction of the proposed project. During the construction of the project, should any previously unidentified archaeological resources such as artifacts, shell, bone, or charcoal deposits, human burial, rock or coral alignments, pavings or walls be encountered, the applicant will stop work and contact the Historic Preservation Office for review and approval of mitigation measures.

IX. MAJOR IMPACTS AND ALTERNATIVES CONSIDERED

As discussed throughout this report, the modest floor area expansion of the existing 235-room Hotel will have negligible environmental or other impact on the building or the surrounding area. There would be a modest increase in the cubic content of the existing structure since most improvements occur within the footprints of the existing hotel structure or building area. Therefore there will be a modest impact on the bulk, height or external appearance of the Hotel.

The only alternative considered was a no action alternative which would leave the Hotel without support services commonly found in hotels.

We feel that the no action alternative would also represent a lost opportunity for the City to reduce the nonconformity of the existing hotel lot and surrounding lots. This no action alternative would eliminate the opportunity for a tradeoff which would result in a reasonable use on the lot, permitting a modest increase in a nonconforming use while gaining a reduction in the nonconforming density on the restructured lot, elimination of five nonconforming (substandard) lots, and eliminating the nonconformity

related to open space. The lot, as reconfigured would provide a substantial amount of open space which would provide a permanent amenity for the surrounding residents and would also eliminate the potential of an additional 15,000 square feet of floor area development.

X. MITIGATION MEASURES

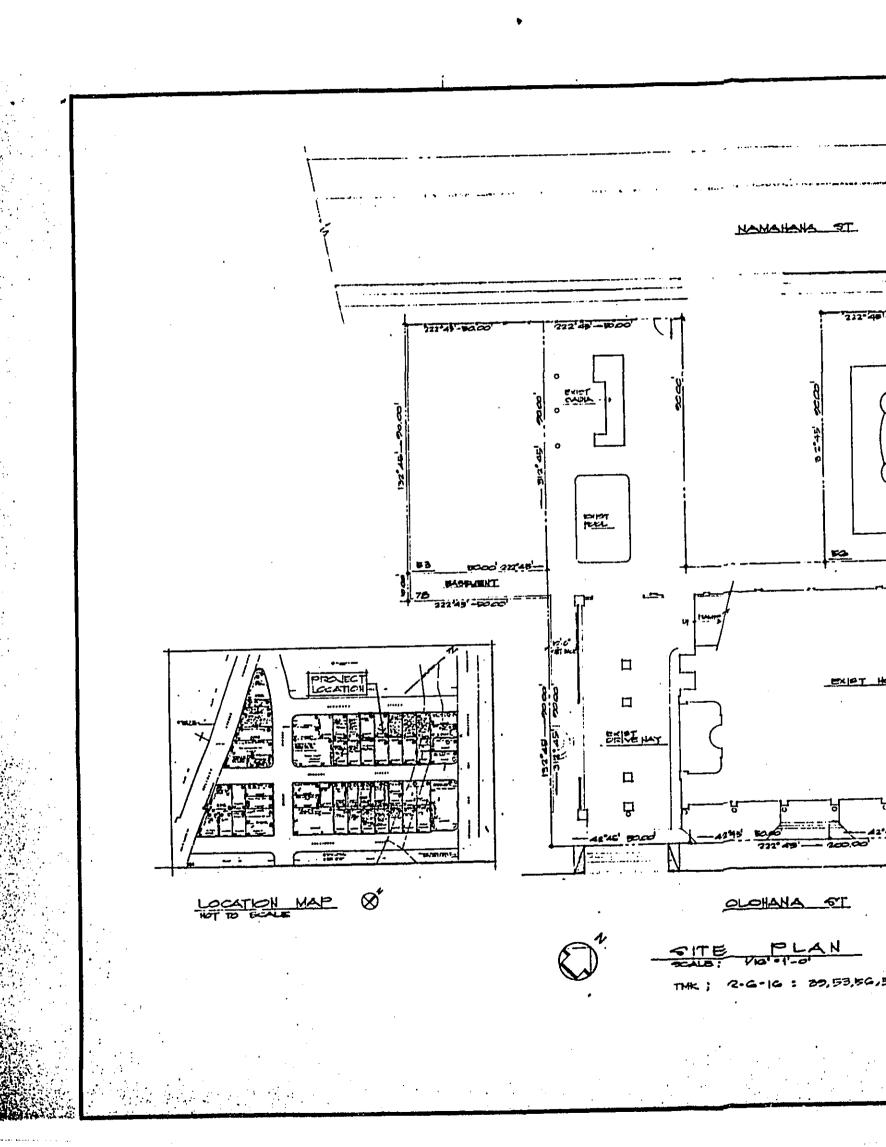
Since impacts of the proposed modest expansion of floor area, occurring primarily within the footprint of the existing structures, are negligible, no mitigation measures are planned.

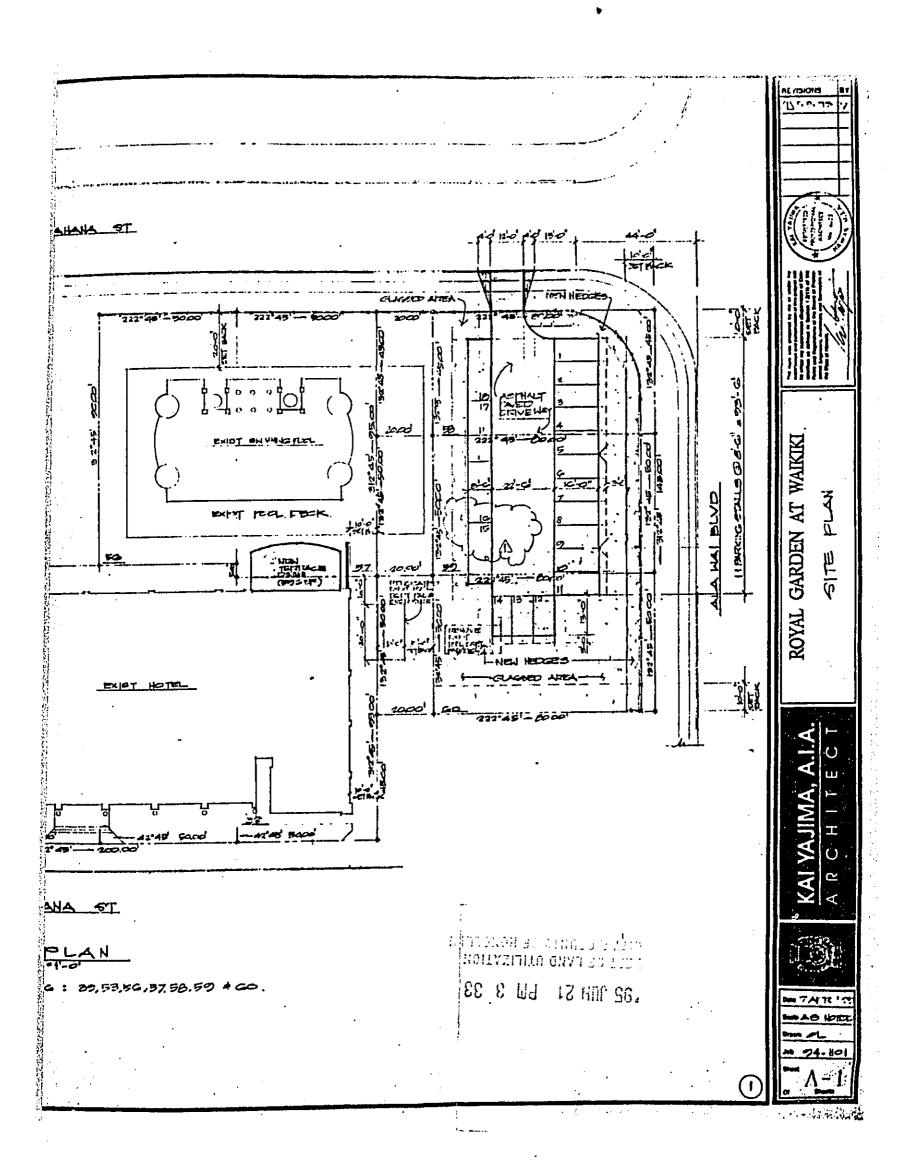
XI. RECOMMENDATION

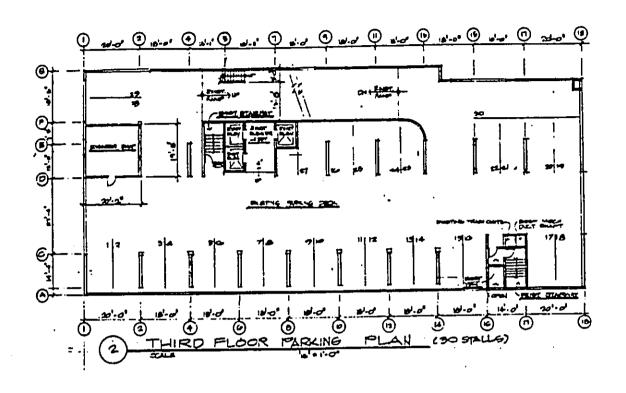
Based on this revised final environmental assessment, we respectfully request a Negative Declaration for the proposed Royal Garden Hotel additions.

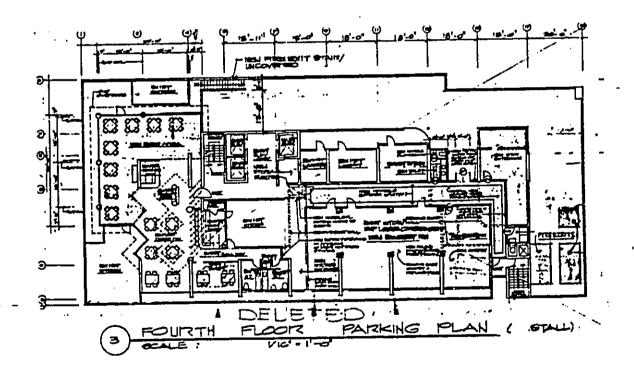
APPENDIX I

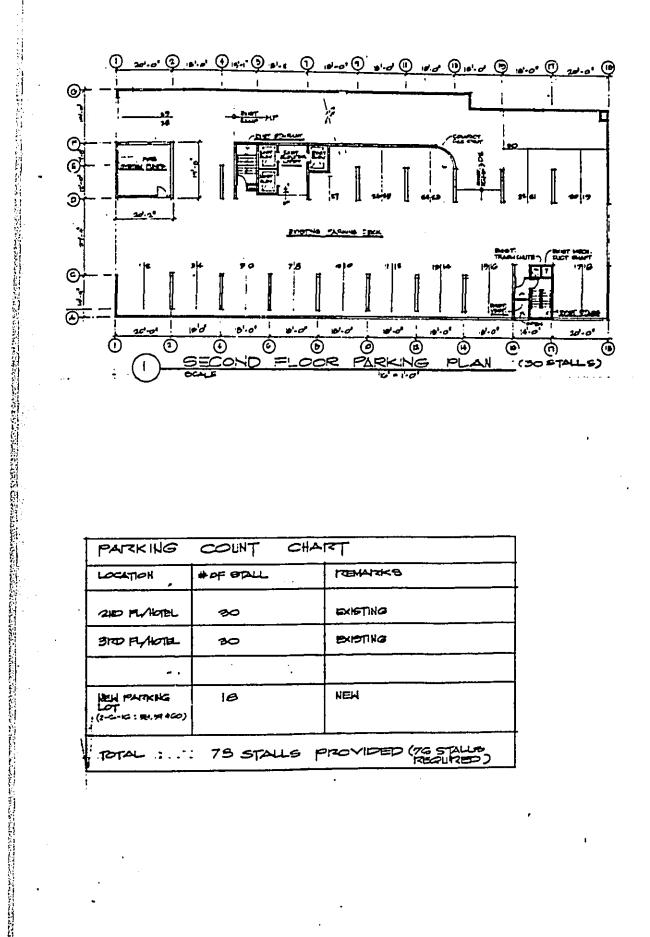
the control of the co







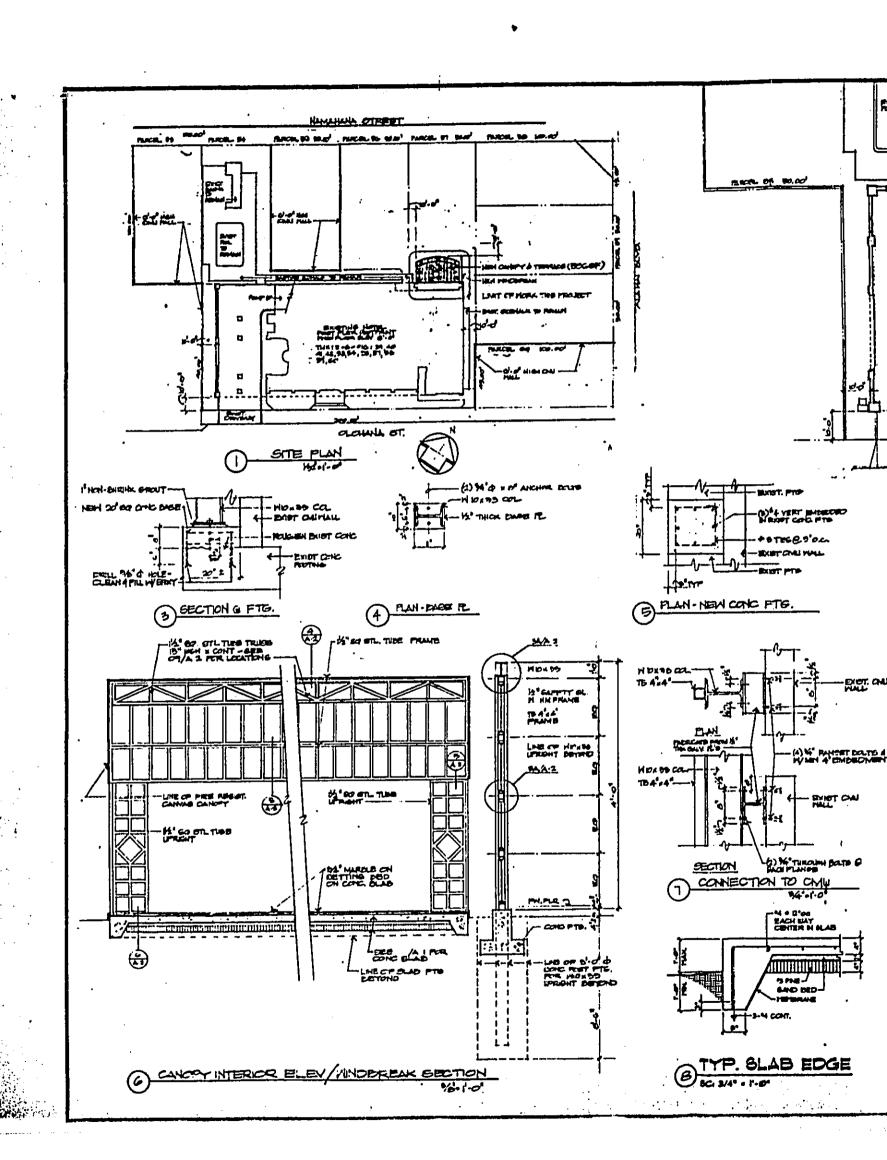


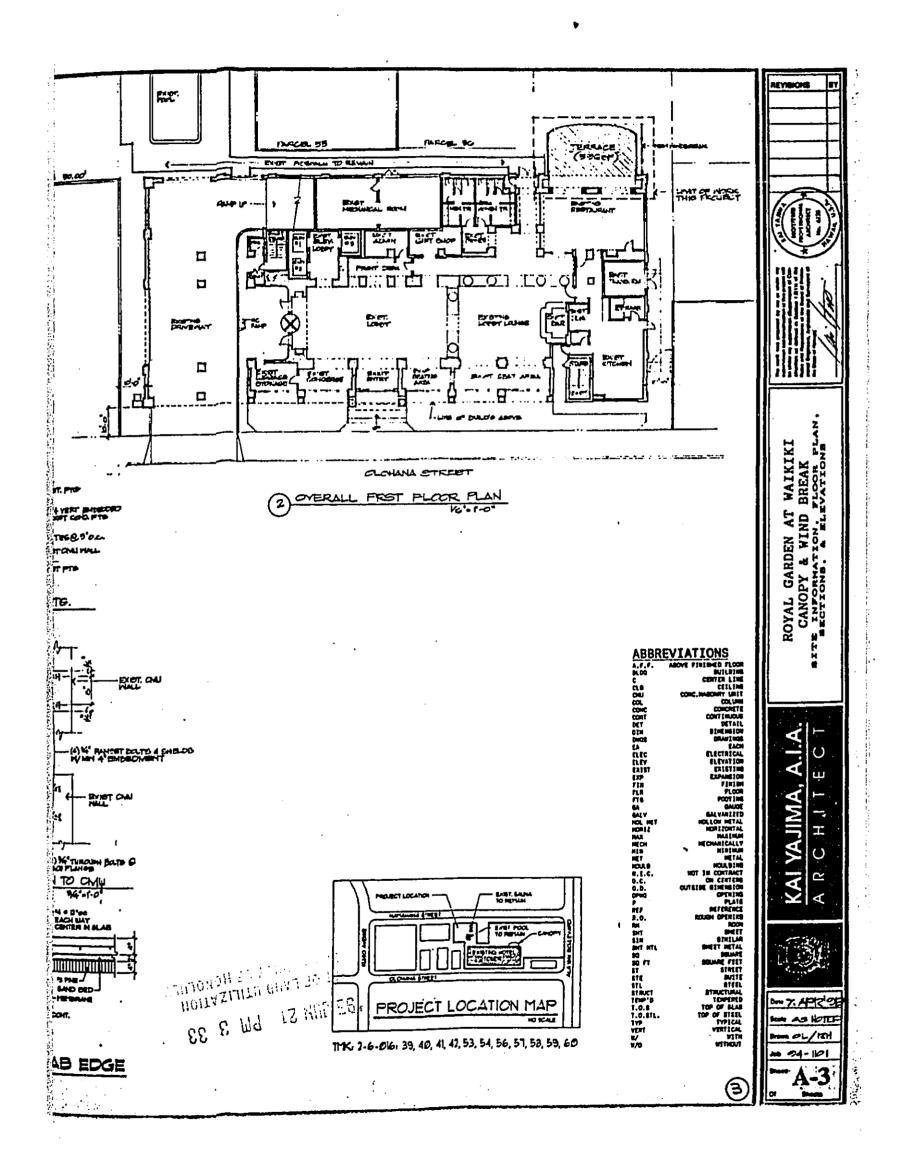


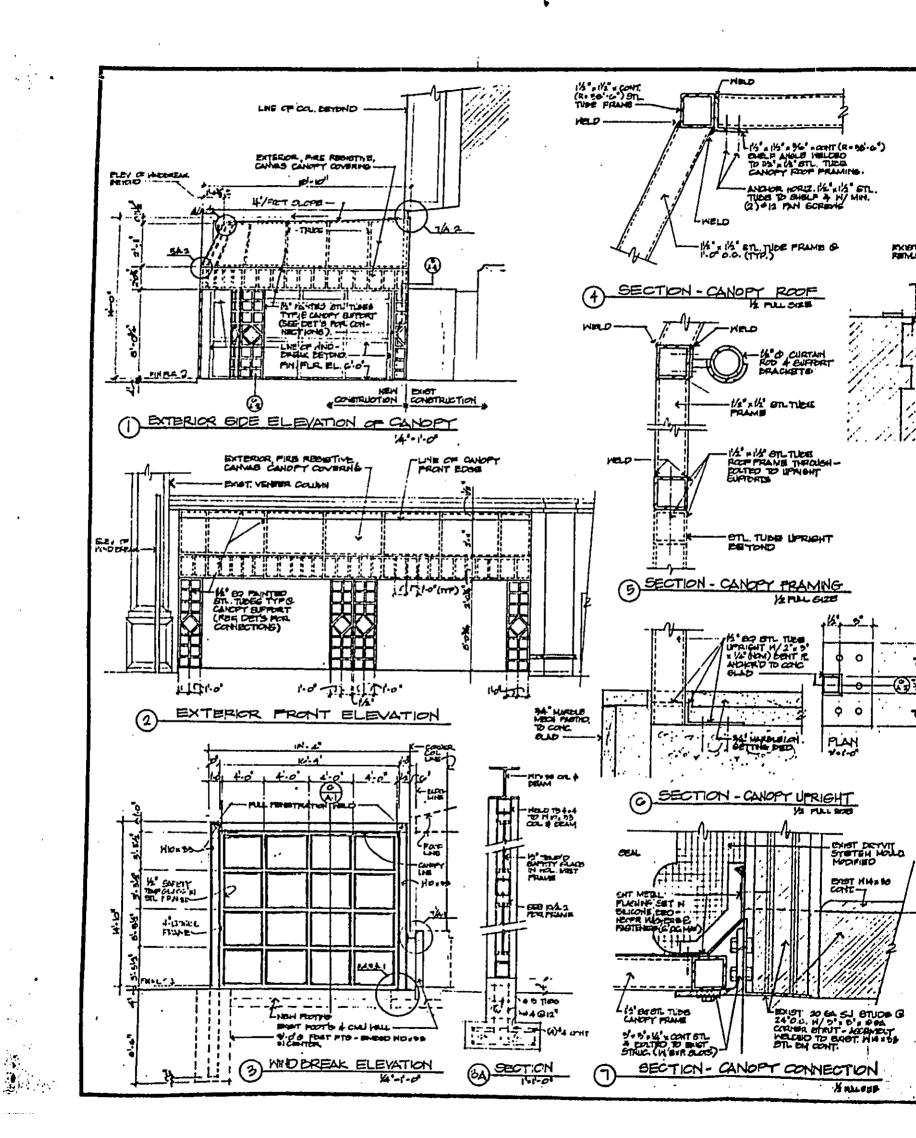
LOCATION	#of epul	TEMATAKE
2110 PL/HOTEL	30	EXISTING
3100 PL/HOTEL	30	EXISTING
٠,		
(2-6-16: 141,41460)	18	NEH

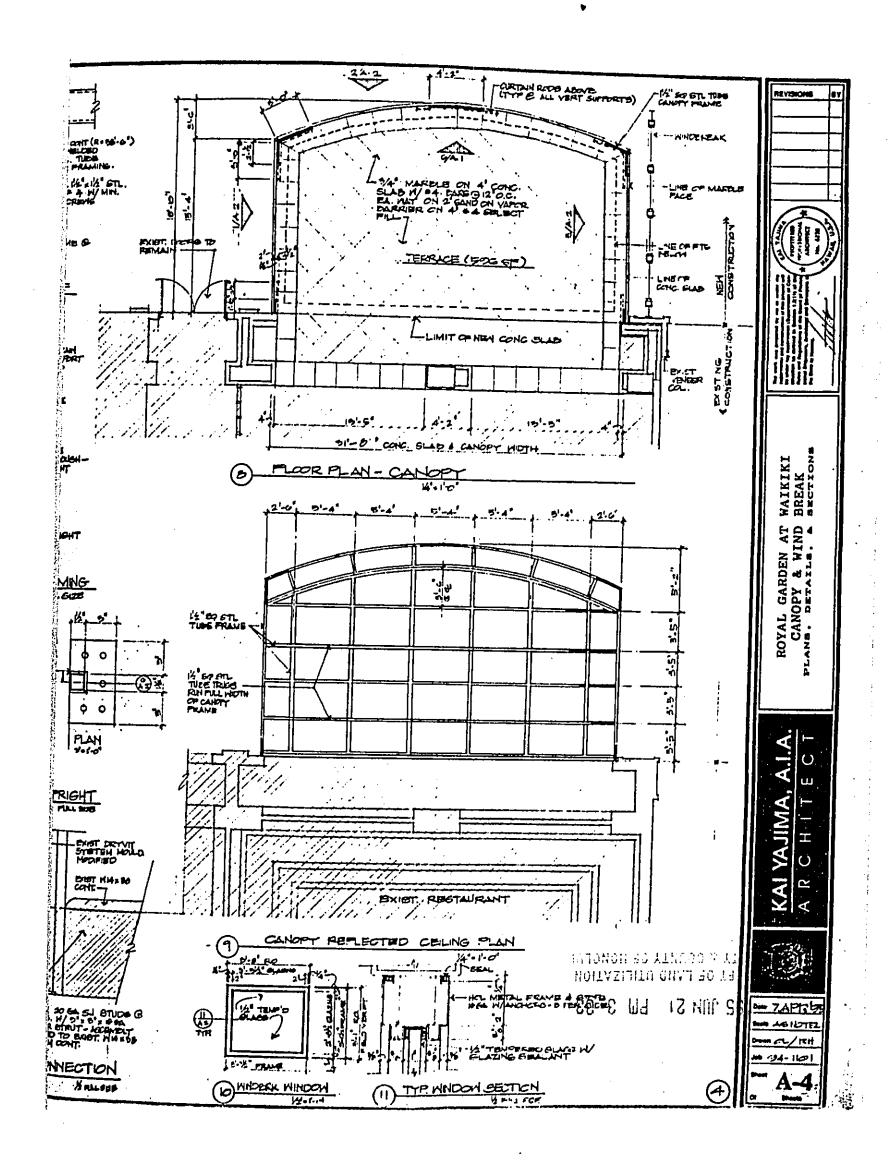
ROYAL GARDEN AT WAIKIKI 上でノマム のでする

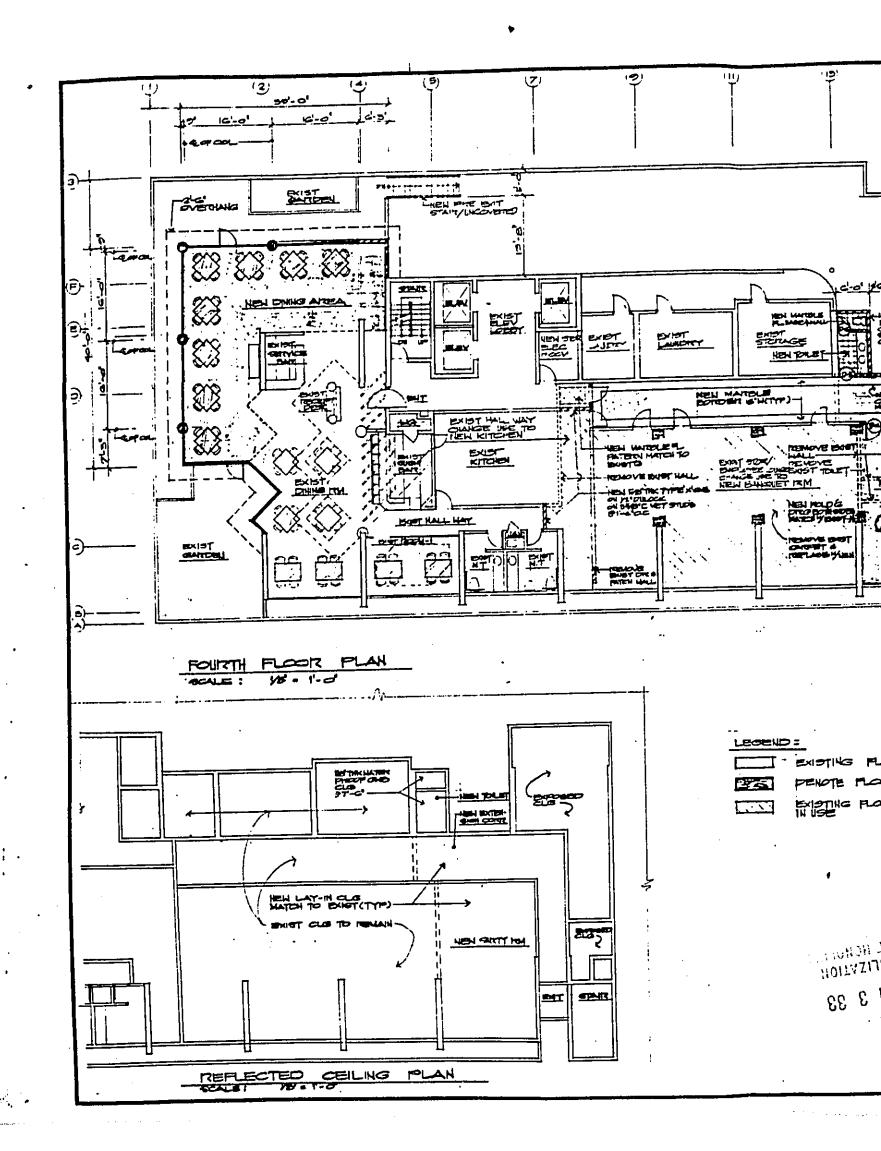
KAI YAJIMA, A.I.A.

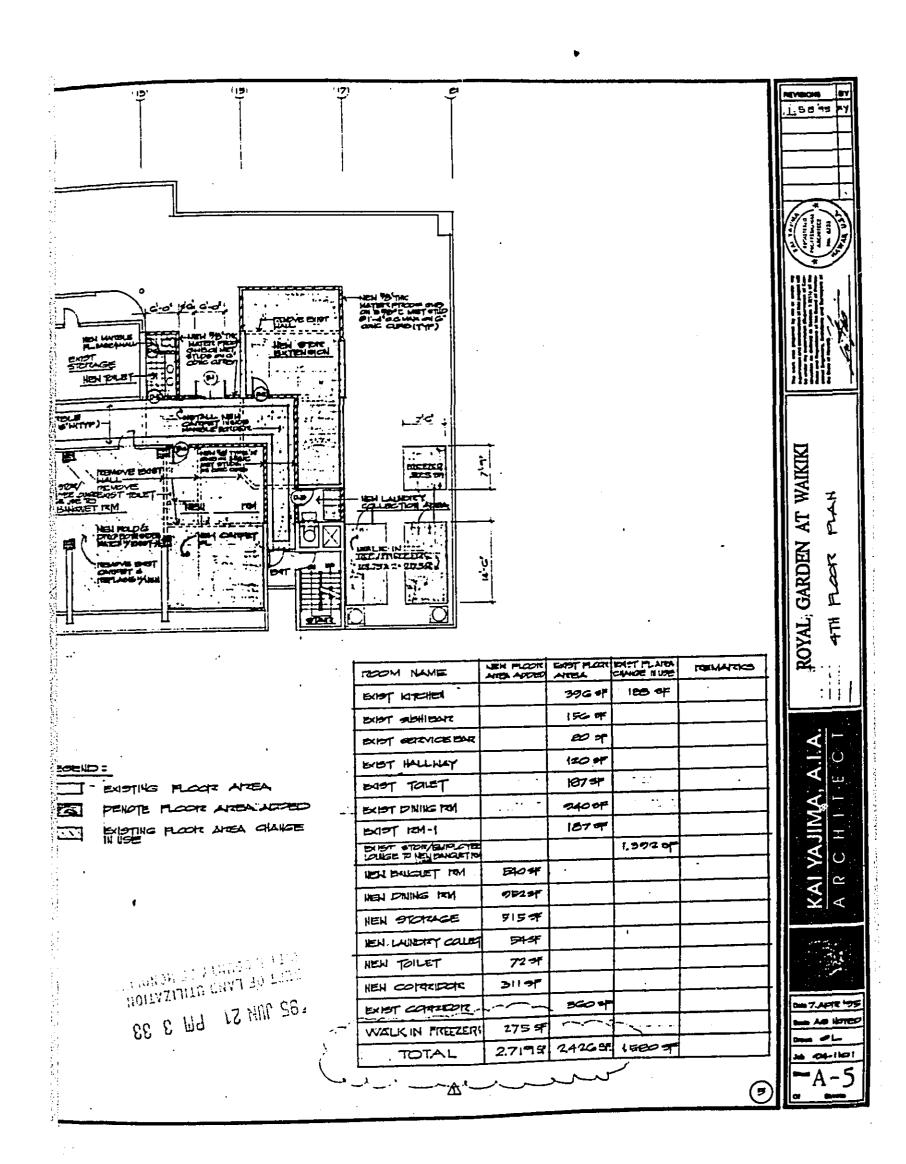


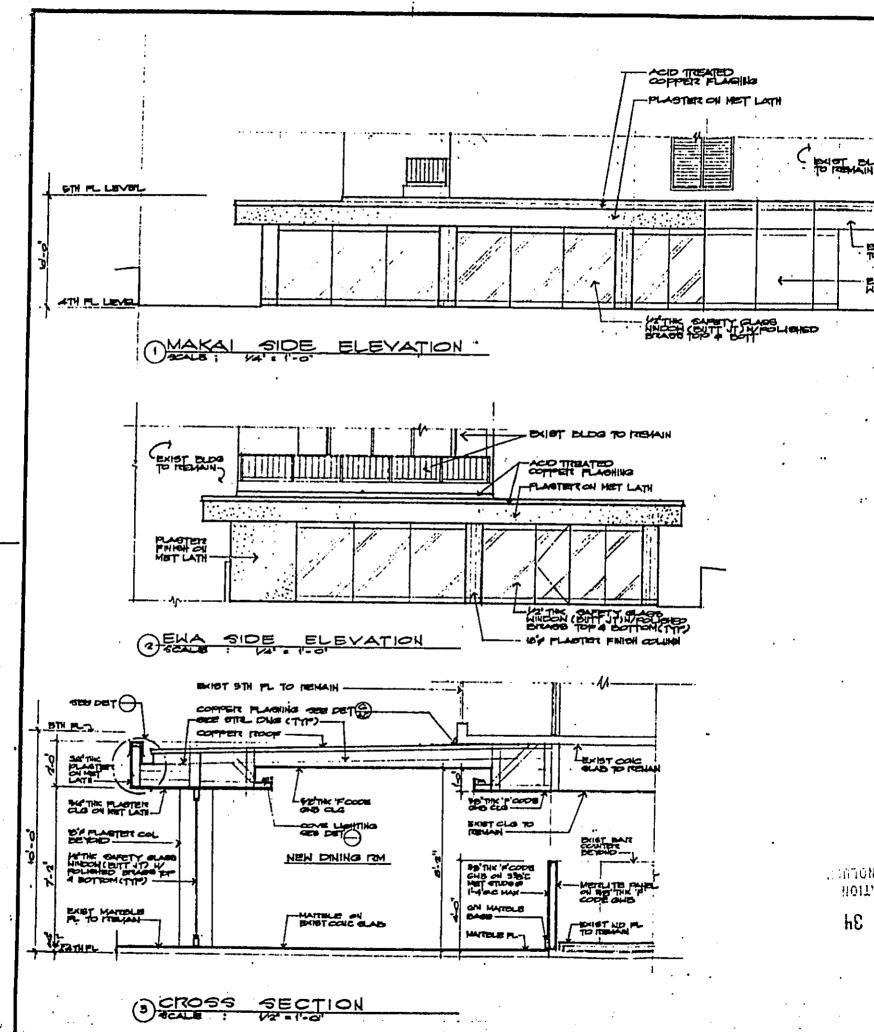




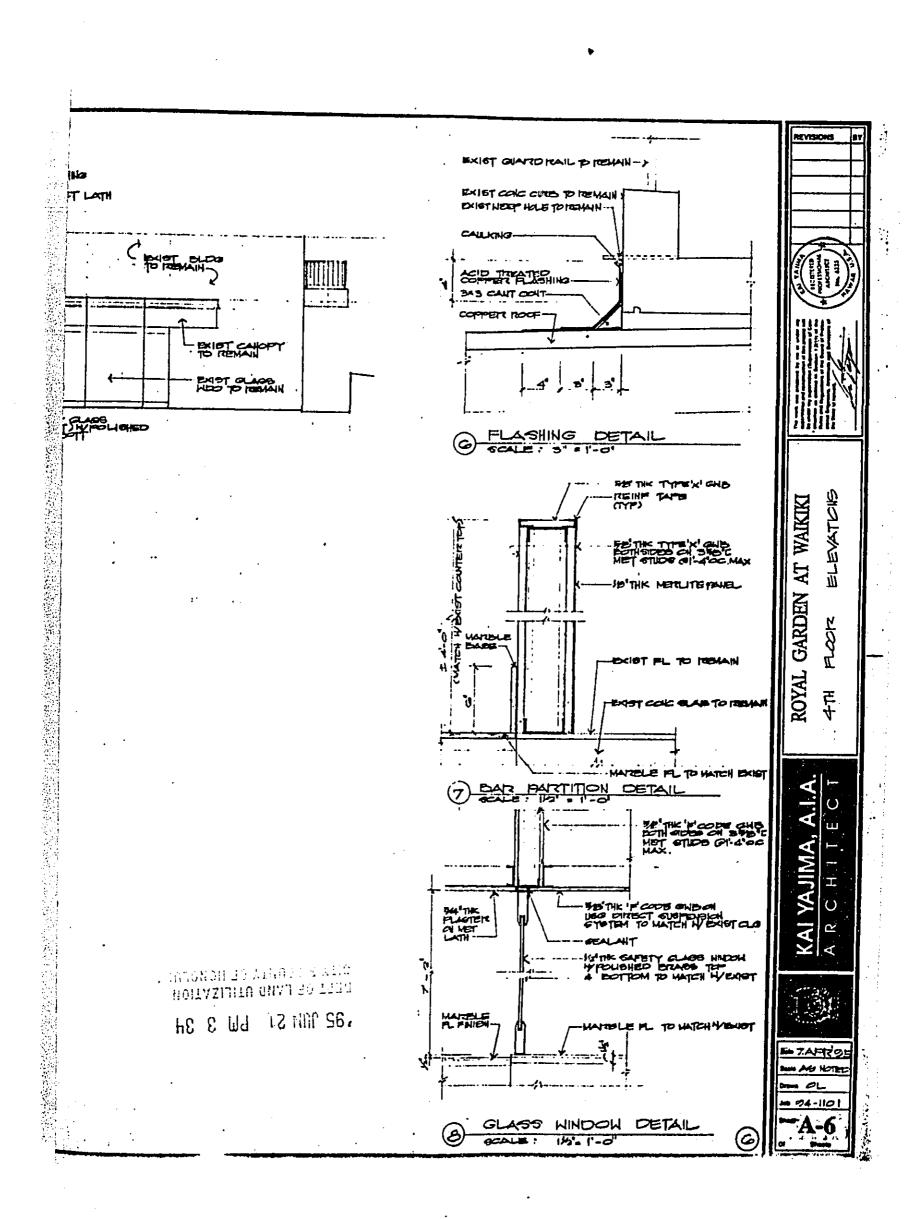


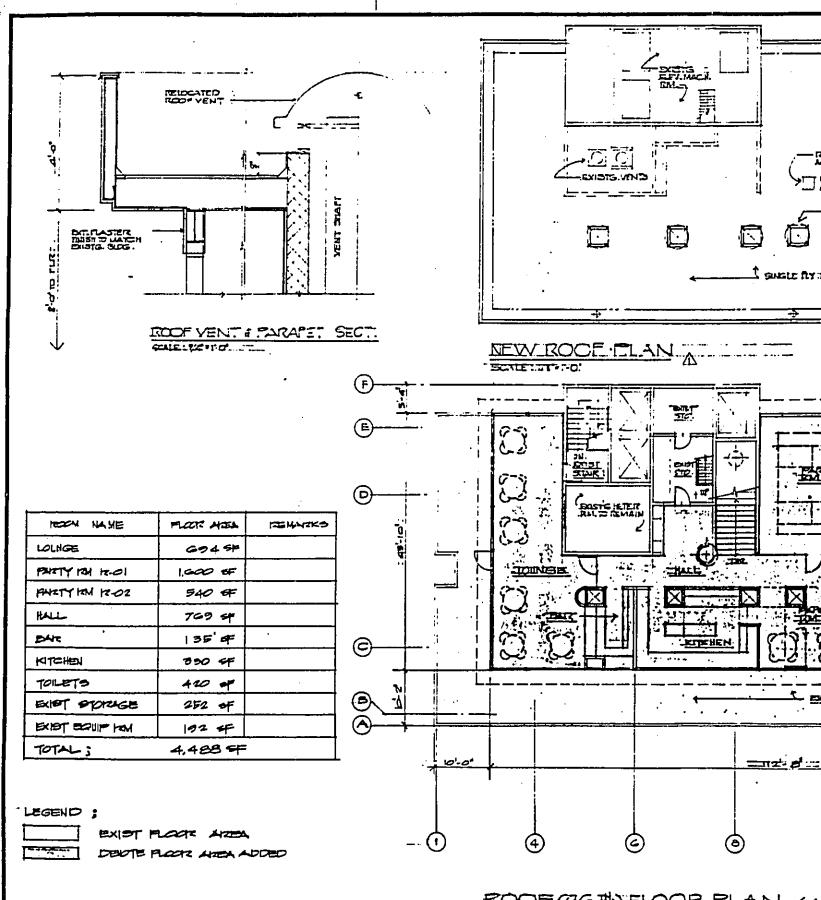




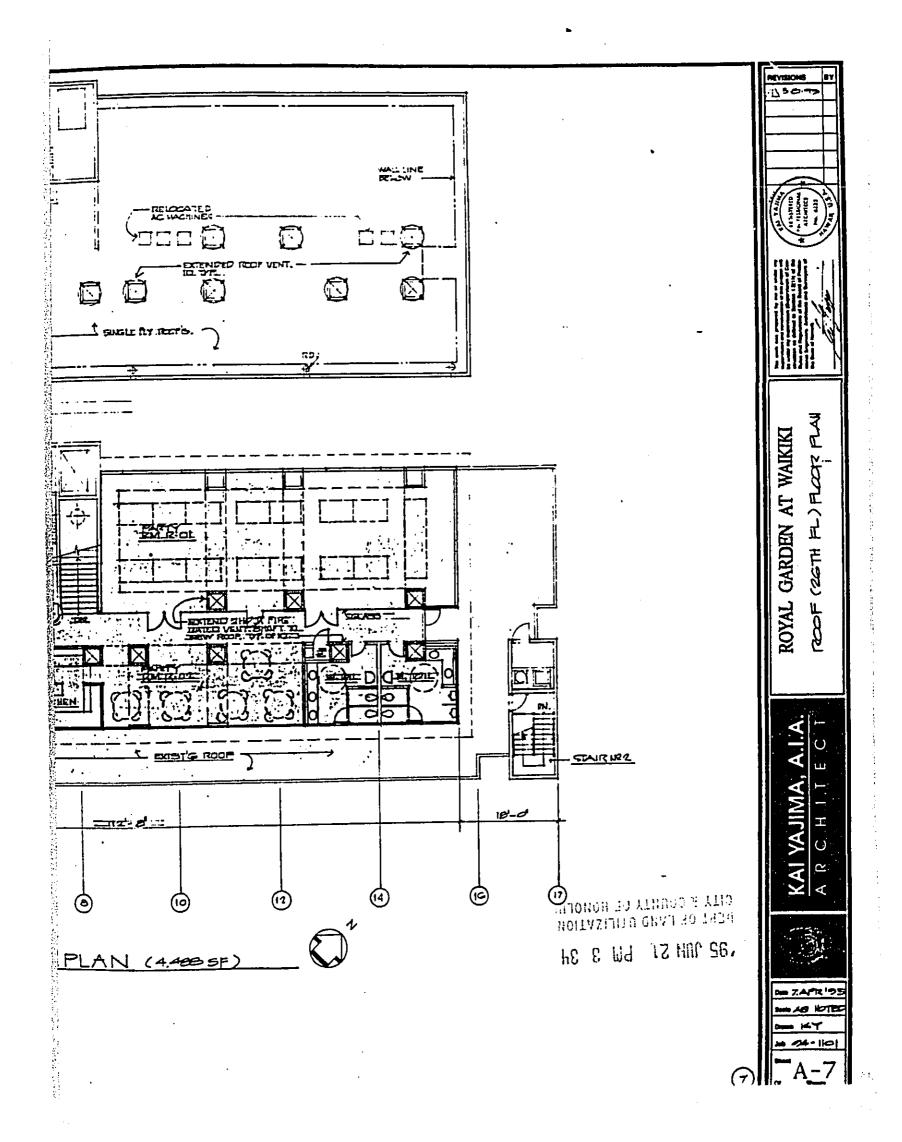


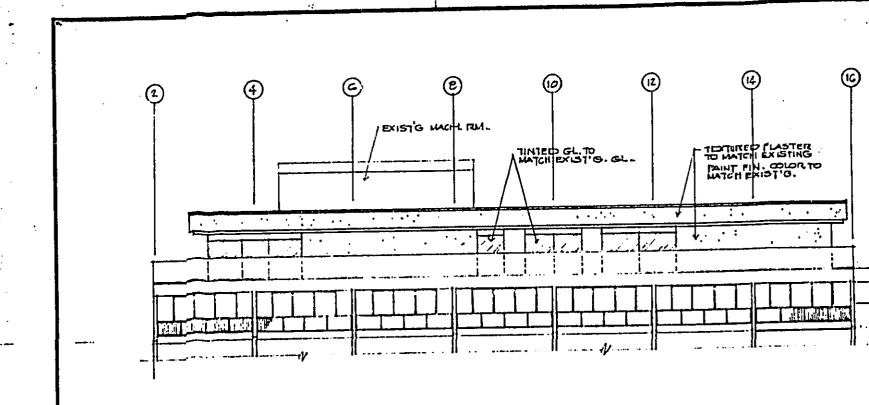
₹ å



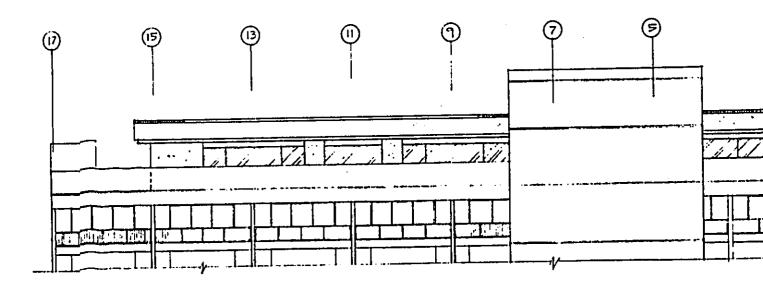


ROOF (76 TH) FLOOR PLAN (4

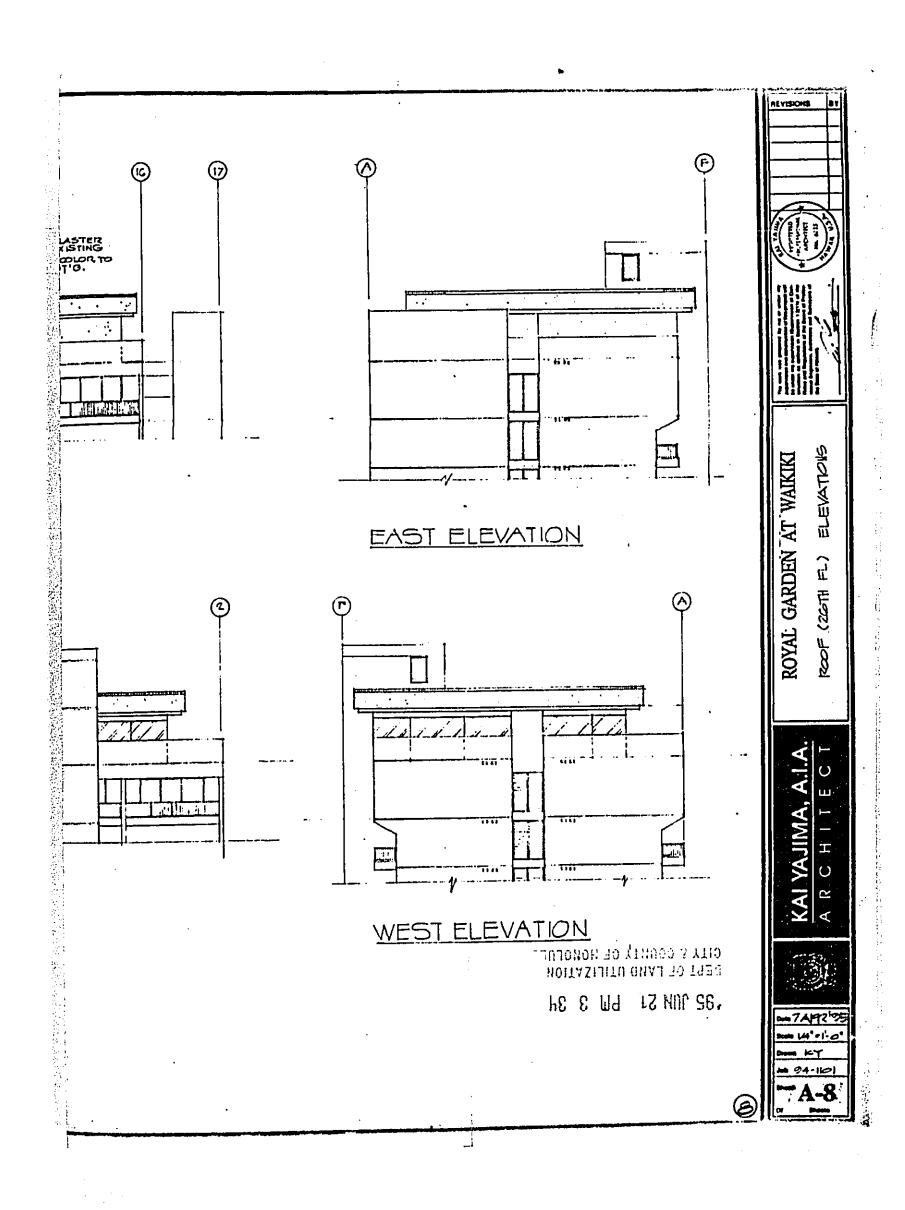


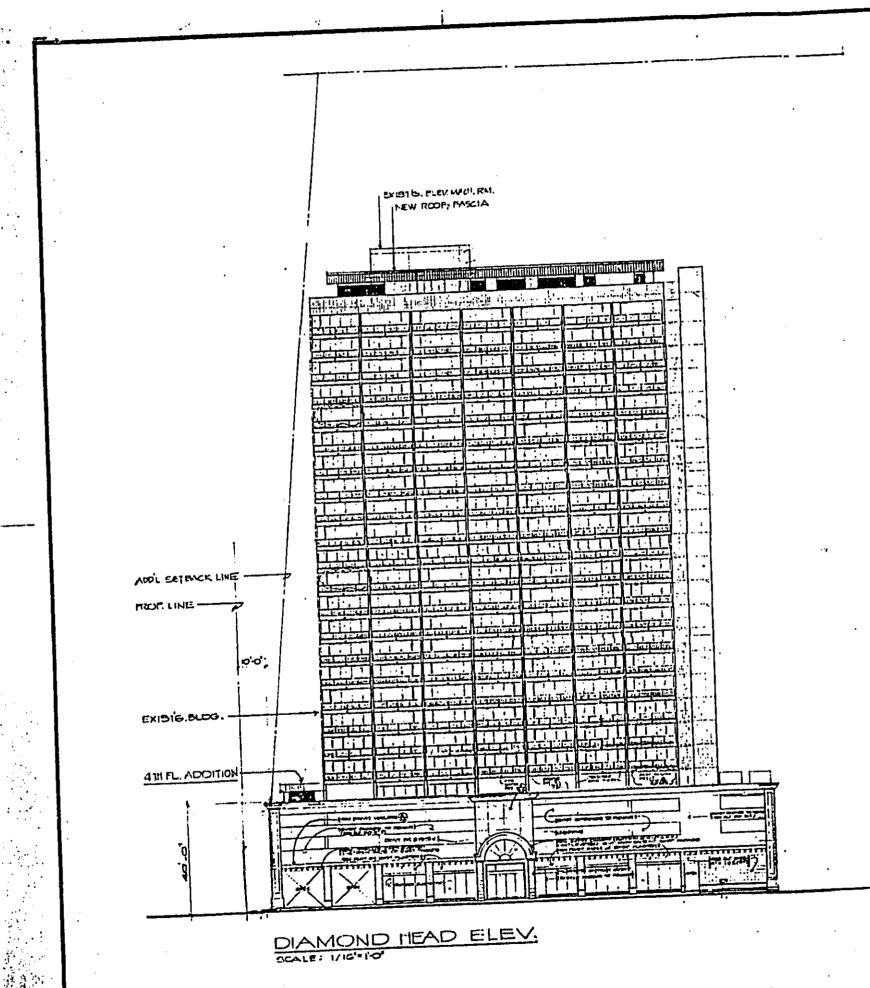


SOUTH ELEVATION

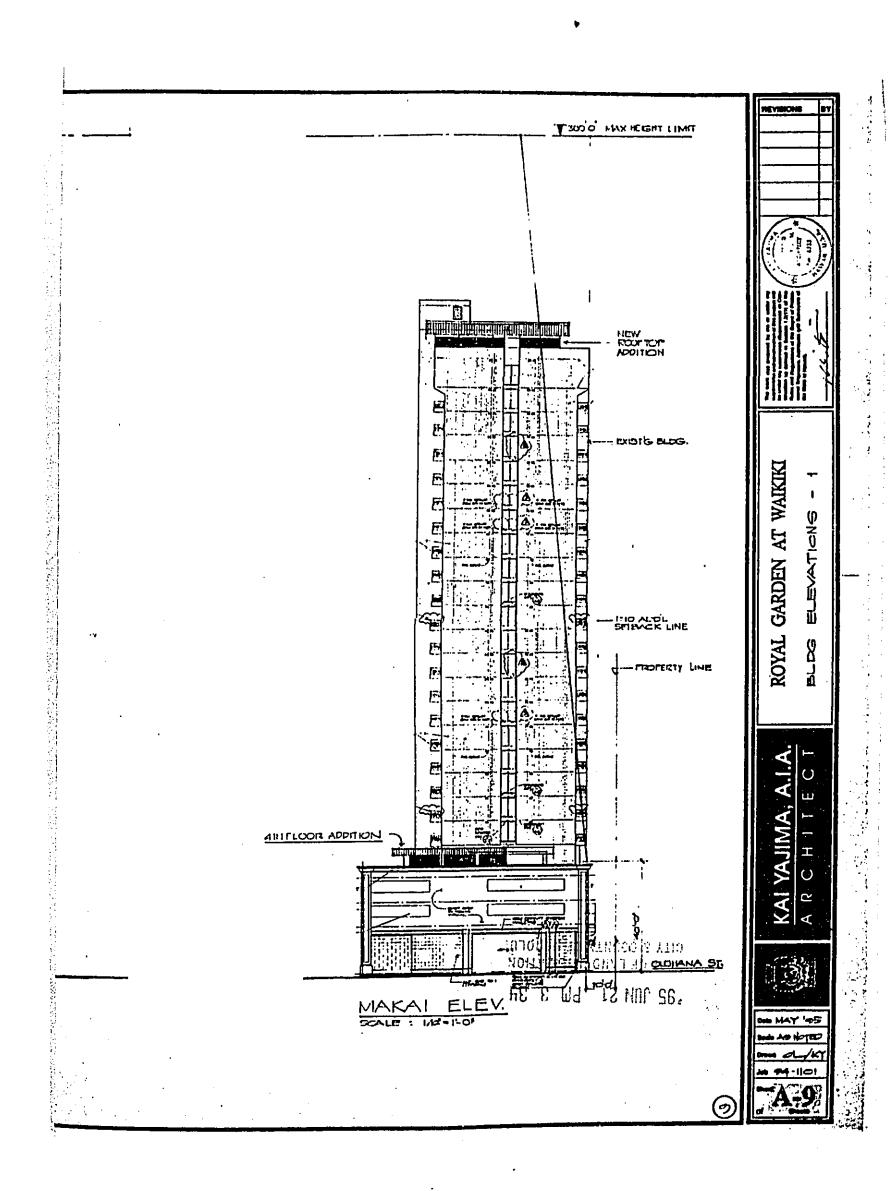


NORTH ELEVATION



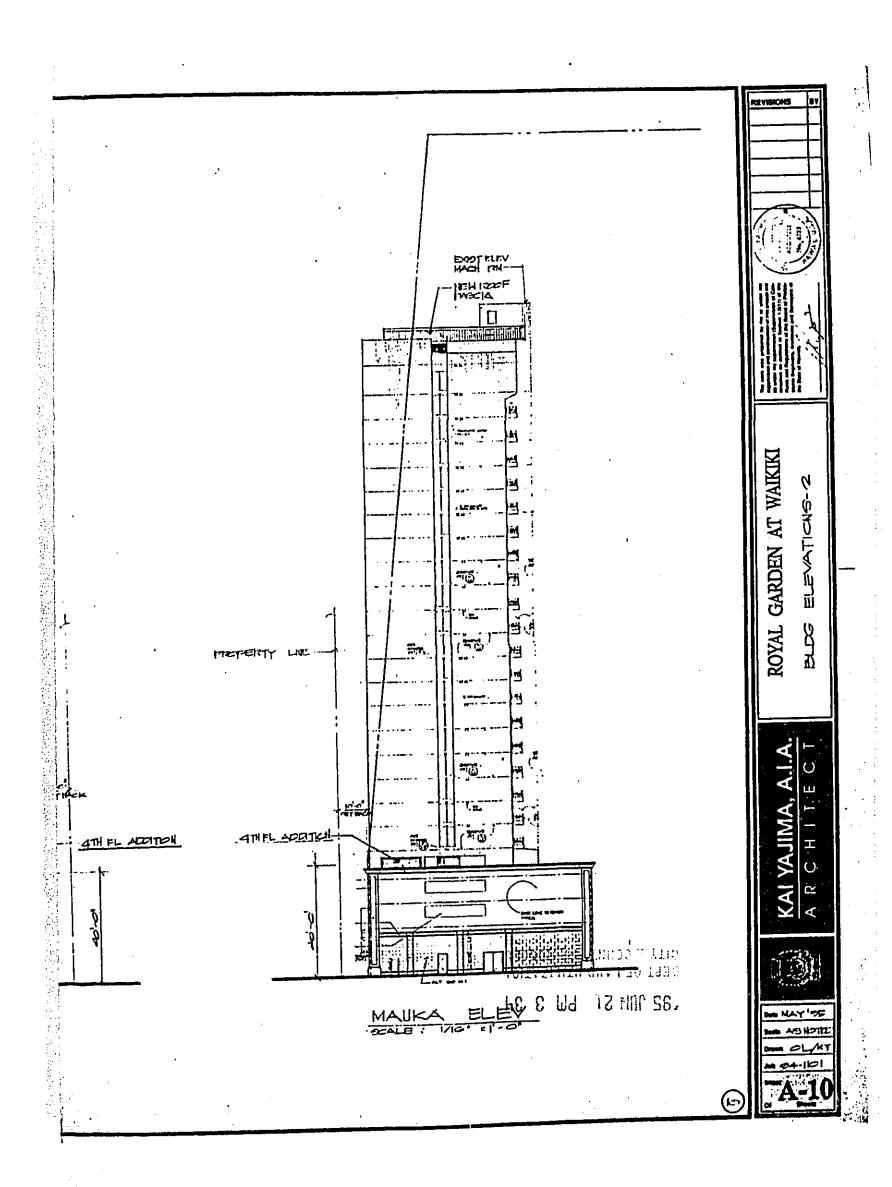


DIAMOND HEAD ELEV. SCALE: 1/16'-1'0"

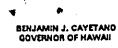


į 200 O" MAX HEIGHT LIVIT -- NEW 1200F FASCIA ت خالم عليه بوالزلق وبدالحادث ليأسك لويار بمهمليل وفارتيان 4-1-1 Ale de la come TWI. PROPERTY LINE k c 4TH FL A THE REAL PROPERTY.

EWA ELEVATION



APPENDIX II





STATE OF HAWAII

DEPARTMENT OF LAND AND NATURAL RESOURCES

STATE HISTORIC PRESERVATION DIVISION 33 SOUTH KING STREET, 6TH FLOOR HONOLULU, HAWAII 96813

4

Ms. Joan Takano Department of Land Utilization City and County of Honolulu 650 South King Street Honolulu, Hawaii 96813

Dear Ms. Takano:

Royal Garden Hotel Expansion SUBJECT:

Waikiki, Kona, Oʻahu

TMK: 2-6-16: 39, 53, 55-57, and por. 58-60

Michael D. Wilson, Charperson Board of Land and Natural Resources

DEPUTY GILBERT COLOMA-AGARAN

AQUACULTURE DEVELOPMENT PROGRAM

AQUATIC RESOURCES

CONSERVATION AND ENVIRONMENTAL AFFAIRS

CONSERVATION AND RESOURCES ENFORCEMENT

CONVEYANCES

FORESTRY AND WILDLIFE HISTORIC PRESERVATION

DIVISION
LAND MANAGEMENT
STATE PARKS
WATER AND LAND DEVELOPMENT

LOG NO: 13880

DOC NO: 9502TDO6

A review of our records shows that portions of these parcels might have contained a major irrigation ditch ('auwai) prior to the Waikiki Reclamation Project, when this area was filled. Excavations at Fort DeRussy, makai of this project, have shown that features such as this were often buried intact. Thus, it is likely that the 'auwai and the fields that it irrigated still contain information important for Hawaiian history and prehistory which would make them eligible for listing on the Hawaii Register of Historic Places. Thus, in the event that a zoning variance for this non conforming project is granted we would appreciate the opportunity to review construction and excavation plans so that we can determine whether the project is likely to have an adverse effect on potentially significant historic sites and make suitable recommendations to your department.

If you have any questions please call Tom Dye at 587-0014.

Sincerely yours

DON HIBBARD, Administrator State Historic Preservation Division

TD:amk